



PLEASE REPLY TO:
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July 19, 2023

Magistrate Judge Steven Tiscione
United States District Court for the Eastern District of New York

Re: Freedom Mortgage Corporation v. Melanie Speich, et al.
Our File No.: 01-096236-F00
Index No.: 22-cv-4851

Dear Magistrate Judge Steven Tiscione:

This firm represents the above-referenced Plaintiff. We are in receipt of the Court's correspondence dated July 19, 2023 and wish to explain what transpired and apologize for our oversight.

The firm's failure to comply with this Court's requests were unintentional. The directives from the Court to provide status reports by 6/30/23 and 7/12/23 were sent to attorney George Mullane, an associate who filed our initial papers but who is no longer employed at this firm. Unfortunately, I did not receive notification of these requests and have rectified the situation by filing my notice of appearance simultaneously herewith.

Plaintiff has not abandoned this action. This matter remains on a loss mitigation hold due to an active COVID forbearance plan. The plan is set to expire on September 30, 2023 and should a permanent settlement not be reached on or before that date, plaintiff intends to proceed with its action.

Our failure to respond to the Court's request for status was not intentional and strictly the result of the lack of timely filing a notice of appearance upon Mr. Mullane's departure from the firm. We apologize for the inconvenience to the Court and respectfully request that the appearance directed on July 27, 2023 be removed from the Court's calendar.

Should you require additional information, or have any questions, please do not hesitate to contact the undersigned.

Very truly yours,

Frenkel, Lambert, Weiss, Weisman & Gordon, LLP

A handwritten signature in blue ink, appearing to read 'Deana Cheli', written over a horizontal line.

Deana Cheli, Esq.
(631) 969-3100 x1280

